

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-149 (NEB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

DEREK GERARD WILLIAMS,
A/K/A "MELIKECHEESEPIZZA,"
A/K/A "KNOTTUPTOANYGOOD,"
A/K/A "JAKE SMITH,"

**STIPULATION REGARDING
RESTITUTION**

Defendant.

The United States of America and Defendant Derek Gerard Williams, by and through the parties' respective attorneys, Miranda E. Dugi, Assistant United States Attorney, and Eric J. Olson, Attorney for Defendant, have entered into this Stipulation Regarding Restitution. The terms of the Stipulation are as follows:

1. On August 16, 2021, Defendant pleaded guilty pursuant to a plea agreement to Count 1 (Advertising Child Pornography, 18 U.S.C. §§ 2251(d),(e)), Count 2 (Production and Attempted Production of Child Pornography, 18 U.S.C. §§ 2251(a), (e)), and Count 3 (Distribution of Child Pornography, 18 U.S.C. §§ 2252(a)(2), (b)(1)).

2. As set forth in the Plea Agreement, Defendant agreed to pay restitution to all of the victims of his crimes, whether named in the Information or not, in the amount of at least \$3,000 pursuant to 18 U.S.C. §§ 2259 and 3663A (Doc. 14 ¶ 14).

3. Defendant agrees to pay the amounts agreed upon by the attorneys who represent the victims as set forth in the table below:

No.	Victim, Series, Information for Payment	Amount
1	SpongeBob series aka Andy Pay to the Order of: Marsh Law Firm PLLC, in trust for Andy 548 Market St., #65135 San Francisco, CA 94104	\$3,000
2	Sweet White Sugar series aka Pia Pay to the Order of: Deborah A. Bianco, in trust for Pia P.O Box 6503 Bellevue, WA 98008	\$3,000
3	BluePillow1 series aka Henley Pay to the Order of: Deborah A. Bianco, in trust for Henley P.O Box 6503 Bellevue, WA 98008	\$3,000
4	Lighthouse 1 series aka Maureen Pay to the Order of: Deborah A. Bianco, in trust for Maureen P.O Box 6503 Bellevue, WA 98008	\$3,000
5	Jan_Socks1 series aka Skylar Carol L. Hepburn in trust for Skylar of the Jan_Socks series PO Box 17718 Seattle, WA 98127	\$3,000
6	Jan_Socks1 series aka Sierra Carol L. Hepburn in trust for Sierra of the Jan_Socks series PO Box 17718 Seattle, WA 98127	\$3,000
7	Marineland1 series aka Sarah Carol L. Hepburn in trust for Sarah of the Marineland1 series PO Box 17718 Seattle, WA 98127	\$3,000
8	Vicky series aka Lily Carol L. Hepburn in trust for Lily of the Vicky series	\$3,000

	PO Box 17718 Seattle, WA 98127	
9	MotorCouch1 series aka Cara Carol L. Hepburn in trust for Cara of the MotorCouch1 series PO Box 17718 Seattle, WA 98127	\$3,000
10	Best Necklace series aka Maria Carol L. Hepburn in trust for Maria of the Best Necklace series PO Box 17718 Seattle, WA 98127	\$3,000
11	At School series aka Violet Carol L. Hepburn in trust for Violet of the At School series PO Box 17718 Seattle, WA 98127	\$3,000
12	8kids series aka John Doe I Tanya Hankins in Trust for the 8 Kids Series The Law Office of Erik Bauer P.O. Box 1091 Tacoma, WA 98401	\$3,000
13	8kids series aka John Doe II Tanya Hankins in Trust for the 8 Kids Series The Law Office of Erik Bauer P.O. Box 1091 Tacoma, WA 98401	\$3,000
14	8kids series aka John Doe III Tanya Hankins in Trust for the 8 Kids Series The Law Office of Erik Bauer P.O. Box 1091 Tacoma, WA 98401	\$3,000
15	8kids series aka John Doe IV Tanya Hankins in Trust for the 8 Kids Series The Law Office of Erik Bauer P.O. Box 1091 Tacoma, WA 98401	\$3,000

16	8kids series aka John Doe V Tanya Hankins in Trust for the 8 Kids Series The Law Office of Erik Bauer P.O. Box 1091 Tacoma, WA 98401	\$3,000
17	Vanessa Draper c/o Ally McQueen, Esq. and Ryan DiSantis, Esq. Jones Day 77 West Wacker Drive, Suite 3500 Chicago, IL 60610	\$6,000
18	“Linda & Patty 1” series, “Patty” c/o Kelly M. Locher Jones Day 500 Grant Street, Suite 4500 Pittsburgh, PA 15219-2514	\$3,000

4. Documentation to support these requests has been provided to the U.S. Attorney’s office and to the Defendant. Previously requested restitution on behalf of victims “Angela,” “April,” and “Chelsea,” have been withdrawn at the request of their counsel, Elaine Tran Lenahan, as communicated to the United States via email on January 2 and January 6, 2022.

5. Defendant agrees to pay a total amount of restitution of \$57,000.

6. The United States supports these agreements regarding the resolution of restitution requests.

7. Defendant agrees that restitution payments shall be made to the Clerk of the Court, United States District Court, District of Minnesota, Minneapolis, Minnesota. The Clerk shall make appropriate payment to the victims at the addresses identified in paragraph 3.

8. Defendant agrees that he will notify the Clerk of the Court and the United States Attorney’s Office, Financial Litigation Unit, 300 South 4th Street, Suite 600, Minneapolis, Minnesota 55415 within 30 days of (a) any change of name, residence or

mailing address; and (b) any material change in economic circumstances that affects his ability to pay restitution.

9. The parties further agree that no delinquent or default penalties will be imposed, except upon order of the Court.

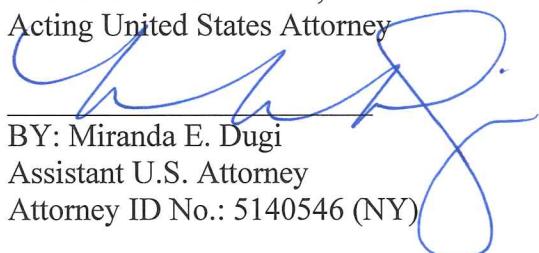
10. Defendant agrees that until such time as the full restitution amount is paid, and while he is incarcerated, he will make quarterly payments of no less than \$25, if he is working non-UNICOR; if he is working UNICOR, he agrees to pay no less than 50% of his monthly earnings towards his restitution obligation.

11. Defendant agrees that if he has not satisfied the full restitution obligation prior to his release from prison, beginning 30 days after his release from prison, he will make payments of at least \$25 per month towards his restitution obligation.

12. The parties respectfully ask the Court to issue a judgment at sentencing reflecting the stipulation contained herein.

Dated: 1/10/2022

CHARLES J. KOVATS, JR.
Acting United States Attorney


BY: Miranda E. Dugi
Assistant U.S. Attorney
Attorney ID No.: 5140546 (NY)

Dated: 1/10/2022


Derek Gerard Williams
Defendant

Dated: 1/10/2022


Eric J. Olson
Counsel for the Defendant

Attorney ID No.: 278427